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Attorneys for Plaintiff,
Modern Font Applications LLC

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF UTAH, CENTRAL DIVISION**

MODERN FONT APPLICATIONS LLC, a
Utah limited liability company,

Plaintiff,

v.

ALASKA AIRLINES, INC., an Alaska
corporation,

Defendant.

Case No. 2:19-cv-00561-DBB-CMR

**DECLARATION IN SUPPORT OF
PLAINTIFF'S OPPOSITION TO
MOTION TO COMPEL
SETTLEMENT AGREEMENTS**

Judge David Barlow
Magistrate Judge Cecilia M. Romero

I, Andrew Oliver, declare as follows:

1. I am over the age of 18 and competent to make the statements herein.

2. I have personal knowledge of the facts described herein and, if called upon to do so, would competently testify thereto. I make this declaration on behalf of Modern Font Applications LLC (“MFA”) and in support of MFA’s Opposition to Motion to Compel Settlement Agreements.

3. I am a lawyer. I advise MFA in an in-house counsel role. I am familiar with the litigation in which MFA engages.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

11. Each of the settlement agreements that MFA has entered has been entered early in litigation. None of the settled cases advanced to a claim construction ruling or even to claim construction briefing. None of the settled cases advanced to significant discovery. None of the settled cases advanced to summary judgment or expert discovery. None of the settled cases advanced to trial or pretrial proceedings.

I declare the under penalty of perjury that the foregoing is true and correct.

Dated: October 28, 2020

/s/ Andrew Oliver
Andrew Oliver